

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

JACQUELINE A. COTE, on behalf of herself
and others similarly situated,

Plaintiff,

v.

WAL-MART STORES, INC.,

Defendant.

No. 15 Civ. 12945 (WGY)

**PLAINTIFF'S MOTION FOR APPROVAL OF ATTORNEYS' FEES
AND REIMBURSEMENT OF EXPENSES**

Plaintiff Jacqueline Cote ("Plaintiff" or "Cote") respectfully submits the following Motion for Approval of Attorney's Fees and Reimbursement of Expenses ("Motion"). For the reasons set forth in the Memorandum of Law in Support of Plaintiff's Motion, the Declarations of Peter Romer-Friedman, Gary Buseck, Matthew Handley, and Peter Grossi in Support of Plaintiff's Motion, and the exhibits attached thereto, Plaintiff respectfully requests that the Court enter an Order¹:

- (1) Granting the Motion;
- (2) Approving payment of attorneys' fees and reimbursement of litigation expenses to Class Counsel in the amount of \$1.875 million for attorney's fees and \$25,285.04 in litigation expenses, to be paid from the Class Settlement Amount in accordance with the terms of the Settlement Agreement, as amended on April 26, 2017; and
- (3) Granting such other, further, or different relief as the Court deems just and proper.

¹ A Proposed Final Approval Order Granting Plaintiff's Motion for Final Approval and approving Plaintiff's requested attorneys' fees and litigation expenses is attached to the Declaration of Peter Romer-Friedman as Exhibit 1.

Walmart does not oppose the relief sought in this Motion.

DATED: April 27, 2017

Respectfully submitted,

JACQUELINE COTE

By her attorneys,

/s/ Peter Romer-Friedman

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CERTIFICATE OF SERVICE

I hereby certify that on the 27th of April, 2017, this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

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